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BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268

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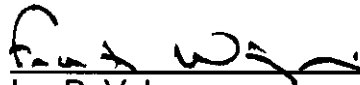
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Docket No. MC98-1

FIRST SET OF INTERROGATORIES OF PITNEY BOWES INC.  
TO USPS WITNESS STIREWALT  
(PB/USPS-T3-1-2)

Pursuant to Sections 25 and 26 of the Commission's Rules of Practice, Pitney Bowes Inc. ("PB") hereby propounds the attached interrogatories and requests for the production of documents. The instructions for responding contained in the First Set of Interrogatories of Pitney Bowes Inc. to USPS Witness Plunkett are incorporated by reference.

Respectfully submitted,



\_\_\_\_\_  
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**PB/USPS-T3-1**

Is any or all of the software to be employed during the experimental period at the San Mateo facility proprietary to the Postal Service (written by or for the Postal Service) as opposed to off-the-shelf software?

- a. If your answer was in the affirmative, identify where in Attachment 1 to Library Reference USPS-LR-1/MC98-1, the costs of developing that proprietary software are reflected.
- b. If any of the San Mateo MOL-related software is off-the-shelf and not identified in the Stirewalt Library Reference-1, please identify that software by brand name and disclose where in Attachment to the Library Reference the costs of it are reflected.

**PB/USPS-T3-2**

Please answer the questions posed in Interrogatory 1 above with respect to any software that the Postal Service will make available to its contract printers at the sites of their facilities.

### CERTIFICATE OF SERVICE

I hereby certify that I have on this date served this document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

DATE: October 26 1998

Ian D. Volner *fw*  
Ian D. Volner